

Fax To: Kenneth G. Ammon, P.E.

From: Kurt G Chandler, Bureau of Indian Affairs /Eastern Region Environmental Scientist

Subject: Draft: Reservations of Water for the Environment and Assurances for Existing Legal Sources Consistent with Federal and State Law.

Comments: James Harriman is no longer working for the Bureau of Indian Affairs. I have been assigned to the Task Force but have not been able to make any of the meetings to date. With additional staff I hope to participate in the Task Force meetings. We are in the process of hiring a hydrologist, which I expect to participate in the Working Group meetings. In general, I am confident that your working with the Seminole and Miccosukee tribes on this project will keep the issues important to the BIA in the forefront. Unfortunately, I haven't had a great deal of time to focus on this project but these are my general comments:

- (1) Your overuse of acronyms adds confusion. The overuse of acronyms makes it read as poorly as a military document, yet you don't have a list that explains them like the military does. If you insist on using them add a list that explains them so the reader doesn't have to re-read everything a dozen times. I first encounter SFWMD on page 8. I assume that is South Florida Water Management District but who can be sure because it isn't explained before it was used.
- (2) On page 19 on the third paragraph it indicates that you will select a 10-year drought year from with the 36 year study period to base consumptive use permitting criteria. The language is not clear whether you are using the drought criteria as a basis for discharge permits or in allotting a minimum quantity of water to various consumers for consumption. In dealing with discharges into water systems there is a move to change from the common 7Q10 to 3Q20 in order to assure adequate dilution in the worst-case scenario. In order to assure your water supply remains clean you may wish to change to this 20-year drought criteria. If you are using the drought level as a basis for determining the minimum water allotments, how would you divide the water when the water available is less than the 10-year drought level? The 20-year drought level is a safer level to use in this case also. Some additional explanation would add clarity.

Please keep me informed of any upcoming meetings.

For further information you may contact me at:

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